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July 29, 2022

VIA CM/ECF

Magistrate Judge Roanne. L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: Green Mountain Holdings(Cayman) Ltd. v. La Hacienda Bufeis LLC et. al.
Case No.: 1:21-cv-00574**

Dear Judge Mann,

Our office represents the Plaintiff, Green Mountain Holdings (Cayman) Ltd., (“Plaintiff”), in the above-referenced matter. Please allow this letter to serve as Plaintiff’s response to the Order dated July 28, 2022.

On May 19, 2022, the Court issued a Scheduling Order for Plaintiff’s Motion for Summary Judgment. The undersigned mistakenly failed to calendar the dates on the Order as it ordinarily would as soon as the Order was issued. As a result, the undersigned missed the deadline to serve and file Plaintiff’s Motion for Summary Judgment. It was in no way the intention of the undersigned to flout a judicial order and Plaintiff should not be prejudiced for the error of the undersigned.

Throughout this case, Plaintiff has been actively participating in this case and a representative of Plaintiff was available to the Court whenever it requested a party present. Therefore, there is no pattern of neglect or willful disregard of Court Orders.

When the Court issued the order on July 28, 2022, Plaintiff’s counsel realized the error and immediately began working on the Motion in order to comply with the new July 29, 2022 deadline. Plaintiff’s counsel also called counsel for Defendants to explain what happened and that, with permission of the Court, Plaintiff would agree to any extension of time needed for counsel to prepare papers in opposition. Counsel stated ten-days was enough time to oppose.

We apologize for the delay and thank the Court for its continued time and consideration.

Respectfully,

/s/ Danielle P. Light